

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,  
  
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a  
Washington Public Corporation; ELIZA  
SAUNDERS, Director of the Office of  
Public Records, in her personal and official  
capacity; ALISON SWENSON, Compliance  
Analyst, in her personal capacity; PERRY  
TAPPER, Public Records Compliance  
Officer, in his personal capacity; ANDREW  
PALMER, Compliance Analyst, in his  
personal capacity; JOHN or JANES DOES  
1-12, in his or her personal capacity,  
  
Defendants.

No. 2:17-cv-00642-MJP

SUPPLEMENTAL DECLARATION  
OF DEREK C. CHEN IN SUPPORT  
OF DEFENDANTS' MOTION TO  
AMEND ANSWER

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants' Reply in support of Defendants' Motion to Amend Answer to Add Two Affirmative Defenses:

A. Attached as **Exhibit 1** is a true and correct copy of email correspondence between myself and counsel for Plaintiff, Joseph Thomas between July 11, 2018 and July 12, 2018.

1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct to the best of my knowledge.

3  
4 DATED this 26<sup>th</sup> day of July, 2018, at Seattle, Washington.

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6 /s/ Derek C. Chen

7 Derek C. Chen, WSBA #49723  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Attorneys for Plaintiff**

Mr. Joseph Thomas  
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Email: joe@joethomas.org

DATED: July 26, 2018

/s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318  
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